REMARKS

The above amendment with the following remarks is submitted to be fully responsive to the Office Action of July 9, 2004. Reconsideration of this application in light of the amendment and the allowance of this application are respectfully requested.

Claims 1-48 were pending in the present application prior to the above amendment. In response to the Office Action, claims 1, 2, 7-9, 14-16, 21, 22, 25, 26, 28, 29, 31, and 34-36 have been amended. Therefore, claims 1-48 are still pending in the present application and are believed to be in proper condition for allowance.

Referring now to the Office Action, claims 1-23, 25-31, and 34-48 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,421,675 to Ryan et al. This reference discloses a search engine and a method for updating an internet search engine database, the search engine being updated with the selections of many different users to thereby prioritize those web listings that have been selected most frequently for a particular given key word. The reference discloses that this allows the search engine to present the user with a listing of the most popular web pages in a subsequent search by the user using the same key word search entry. The Examiner interprets this reference as disclosing various aspects of the present invention as embodied in claims 1-23, 25-31, and 34-48. The Applicants respectfully disagree for the reasons set forth in detail hereinbelow.

It appears that the Examiner has misunderstood the present invention and/or the invention disclosed in Ryan et al., and correspondingly, has rejected the presently pending claims. Initially, the present invention is directed to a method, a system, and a program, that receives a set of lists from a plurality of remote web services, distills the lists into frequency database, obtains a query, and searches the frequency database for matches between the query and the search terms in the database. The present invention also selects the matches having the highest associated frequencies, the selected matches indicating a corresponding remote web services, and generates a directed content based on the selected web service. As described in the specification of the application, the present invention directs the user who submits a query, to either the remote web service or data from the remote web service that is most likely to have information regarding the query term. The selection of the remote web service is determined by examining a frequency database that

sets forth frequency information for the specific query with respect to the plurality of remote web services. In other words, the frequency database sets forth the number of times the query has been submitted to each of the plurality of remote web services as a search term for searching within the remote web service. The underlying premise of the present invention is that the remote web service which receives a high frequency of a particular search term will be more likely to have relevant information regarding the query as compared to other remote web services in which the query has not been frequently submitted as a search term.

As further described in the specification, the search term listings are provided by each of the respective plurality of remote web services, and is further maintained by the respective web service. This is important in that the remote web services can easily keep and maintain frequency information regarding search terms that are submitted for searching, whereas this task would be very difficult by a third party. The present invention further distills the received set of lists into a frequency database that identifies those remote web services to which the search query was submitted most frequently. These remote web services are selected, and directed content is generated by the present invention based on the remote web services having the highest associated frequencies for the obtained query. Thus, the present invention processes the set of lists of search terms to derive a frequency database, which can then be used for the selection of the remote web services that are likely to have information associated with the query.

The cited Ryan et al. reference fails to disclose the present invention as claimed and described in the specification. Moreover, Ryan et al. further fails to teach or otherwise suggest the present invention. Correspondingly, the Examiner's rejection should be reconsidered and withdrawn. In particular, as noted previously, Ryan et al. discloses a system and method for updating an internet search engine database that provides users with web pages that are relevant to the user's query. In this respect, Ryan et al. does disclose a list that is referred to by the disclosed system for corresponding to the search query by the user. However, the disclosed list consists of web pages that are frequently generated as results of the search for the submitted search term, and not a list of search terms as recited in the pending claims. In this respect, the disclosed system of Ryan et al. essentially bypasses the search engines that provided the results of the search

(i.e. the uncovered web pages), and provides the most frequently selected pages directly to the user submitting the query.

In contrast, the present invention does not bypass the remote web service to which the search term was submitted, but instead, generates directed content based on the selected web services. This distinction is important in that the present invention allows the most up to date and accurate information associated with the user's query to be provided. This is attained by the fact that as previously noted, the user's search query is provided to the selected remote web service that receives a high frequency of the search term. Correspondingly, because the selected remote web service is likely to have the most updated information associated with the search query, the selected remote web service can provide the most updated and accurate information.

In contrast, in the search engine disclosed in Ryan et al., because the web pages are saved as results of the search (instead of search terms), such web pages that are provided can become quickly outdated and inaccurate, but continually presented by the search engine of Ryan et al. Again, this is due to the fact that the search engine of Ryan et al. relies upon the frequency in which the web pages are selected. The web pages that are most frequently selected by the users may correspond to the web page results that are generated by the remote web service. However, the results cannot be controlled by the remote web service since the results is dependent on the frequency of selection of other users. In addition, there is an associated time lag inherent in the search engine of Ryan et al. in that the most up to date and accurate web pages need to be selected with high enough frequency in order for the updated web page to be provided as a search result. The present invention does not have these limitations since the query are provided to the remote web service which can control the resulting content provided instead of providing web pages that may be outdated and/or inaccurate.

In addition, as the Examiner notes, Ryan et al. does disclose a key word data table with number of times a particular word has been requested (Table 1). However, as clearly described in Ryan et al., the words of the key word data table are <u>not</u> associated with remote web services that are searchable (i.e. are adapted to receive submissions of search terms and perform searches for the search term submitted) as claimed in the pending claims. Instead, Ryan et al. discloses that the key words of the key word data table are

associated with user profiles of people entering the key word (see Figure 6; column 21, lines 12-27) and to specific web pages that are the results generated by other search engines which are most frequently selected by the users.

In addition, whereas Ryan et al. also discloses use of key word information that are associated with a web page, and storing these key words in a database, the reference clarifies that these key words are submitted by website designers to the search engine to allow their respective webpage to be found easily. Of course this method of searching by submitting certain number of key words to be associated with a particular web page is known in the art and is independent of the subject of the present invention which can be implemented with this feature as well.

In summary, whereas the present invention provides the user with directed content based on the respective selected web services so that the directed content is generated based on the remote web services having the highest associated frequencies for obtained query, the search engine described in Ryan et al. generates a listing of web pages that have been generated by other search engines, and selected most frequently by the users for viewing. Thus, Ryan et al. fails to disclose the present invention as claimed. In view of the above, the withdrawal of the Examiner's rejection relative to claims 1-23, 25-31, and 34-48 are respectfully requested, the Ryan et al. reference cited by the Examiner failing to disclose each and every feature of the recited claims.

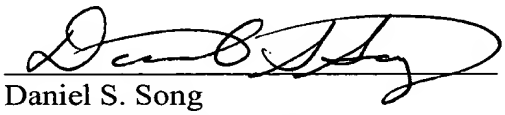
To more clearly define the present invention, independent claims 1, 7, 14, 15, and 21 have been amended to specifically recite that matches having the highest associated frequencies are selected, each selected match indicating a respective selected remote web service to which the query was submitted as a search term. Clearly, the cited Ryan et al. reference fails to disclose, teach, or otherwise suggest selecting matches having the highest associated frequency, or respective selection of a remote web service to which the query was submitted as a search term. In addition, claims 22, 26, 29, 34-36 have been further amended to specifically recite that the remote web service is adapted to receive submissions of at least one search term and perform a search for the search term submitted, and to recite searching of the selected remote web service for the query. Moreover, these claims have also been amended to specifically recite generation of the directed content to include portion of the data that is generated in response to the query.

Finally, claims 2, 9, 16, and 28 have also been amended to better correspond to the corresponding amended independent claims. Clearly these features are not disclosed, taught, or otherwise suggested in the Ryan et al. reference. Therefore, the withdrawal of this rejection with respect to these claims, and dependent claims dependent thereon, are respectfully requested.

Referring again to the Office Action, claims 24, 32, and 33 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ryan et al. discussed in detail above, in view of the article by Chris Sherman. However, this rejection is believed to be rendered moot in view of the above remarks and amendments to the claims at least for the reason that these claims depend from otherwise allowable claims. Moreover, it is noted that Chris Sherman's article fails to cure the deficiencies of the primary reference Ryan et al. discussed in detail above. Therefore, the withdrawal of this rejection and the allowance of claims 24, 32, and 33 are respectfully requested.

In view of the foregoing, it is submitted that the present application is in condition for allowance and a notice to that effect is respectfully requested. However, if the Examiner deems that any issue remains after considering this response, he is invited to call the undersigned to expedite the prosecution and work out any such issue by telephone.

Respectfully submitted,



Daniel S. Song
Registration No. 43,143

NIXON PEABODY LLP
401 9th Street, N.W., Suite 900
Washington, D.C. 20004-2128
(202) 585-8000
(202) 585-8080 (Fax)
Customer No. 22204

Dated: October 12, 2004